

Mr. Robert Mead  
Precoat Metals division Sequa Corporation  
4800 South Kilbourn Avenue  
Chicago, Illinois 60632

Re: 127-14061  
First Administrative Amendment to  
Part 70 127-6025-00005

Dear Mr. Mead:

Precoat Metals division Sequa Corporation was issued a permit on February 10, 1999 for a metal coil coating source. A letter requesting a change in the permit was received on March 12, 2001. The changes will constitute a revision to descriptive information of the Part 70 Permit where the revision will not trigger a new applicable requirements and will also result in reduction of the potential to emit for all criteria pollutants. Therefore, the permit change is subject to 326 IAC 2-7-1 and hereby administratively amended as follows (changes are bolded and deletions are struck-through for emphasis):

1. IDEM has issued permits for a significant source modification (SSM 127-11613) and significant permit modification (127-11786) on April 5, 2000. The plant has yet to commence construction on the source and has since changed the scope of the project due to the recent trend in high natural gas costs. Accordingly, the permitted changes is proposed to be changed as follows:

ITEM	Permitted Change	Proposed Change
Finish Regenerative Oxidizer	Install 30.0 mmBtu/hr oxidizer with waste heat boiler	Put prime recuperative thermal oxidizer on finish oven
Prime recuperative thermal oxidizer	None	Install 5.38 mmBtu/hr regenerative oxidizer with waste heat boiler
New Equipment	Chemical Coater with 7.5 mmBtu/hr infra-red oven	As permitted
Replace existing 10.998 mmBtu/hr boiler	Add new 25.1 mmBtu/hr boiler	As permitted

#### Changes to the Part 70 Permit

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

---

This stationary metal coil coating source consists of the following emission units and pollution control devices:

- (1) One (1) coil coating line consisting of the following:
  - (a) A Prime Coating Section (PCS), constructed in 1971, consisting of one (1) prime coater, identified as EU1, with a maximum capacity of 883 lb VOC/hr (**2.0 gal VOC/min**), using one (1) **5.38 48.2-million British thermal units/hr regenerative thermal oxidizer with waste heat boiler** ~~recuperative thermal oxidizer~~, identified as EU4/CE-1, as control ~~with a maximum capacity of 2.0 gal VOC/min~~, one (1) 33.6 million British thermal units/hr prime curing oven, identified as EU2, ~~all~~ exhausting to one (1) stack, identified as S-1, and one (1) prime water cooler, identified as EU3, exhausting to one (1) stack, identified as S-2. **The regenerative thermal oxidizer exhausts to stack S-1 and the waste heat boiler will exhaust to stack S-14.**
  - (b) A Finish Coating Section (FCS), constructed in 1971, consisting of one (1) finish coater, identified as EU5, with a maximum capacity of 1142 lb VOC/hr (**3.75 gal VOC/min**), using **one (1) 18.2 million British thermal units/hr recuperative thermal oxidizer** ~~direct flame finish oxidizer, rated at 30.0 million British thermal units per hour, identified as EU8/CE-2, as control with a maximum capacity of 3.75 gal VOC/min with heat exhausting to a waste heat boiler exhausting to stack S-14~~, one (1) 37.6 mmBtu/hr finish curing oven, identified as EU6, all exhausting to one (1) stack, identified as S-3, and one (1) finish water cooler, identified as EU7, exhausting to one (1) stack, identified as S-4.
- (2) One (1) natural gas-fired process boiler, identified as EU9, rated at 25.1 million British thermal units per hour, exhausting to Stack S-5.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) coil coating line consisting of the following:
- (a) A Prime Coating Section (PCS), constructed in 1971, consisting of one (1) prime coater, identified as EU1, with a maximum capacity of 883 lb VOC/hr (**2.0 gal VOC/min**), using one (1) **5.38 million British thermal units/hr regenerative thermal oxidizer with waste heat boiler** ~~recuperative thermal oxidizer~~, identified as EU4/CE-1, as control with a maximum capacity of 2.0 gal VOC/min, one (1) 33.6 million British thermal units/hr prime curing oven, identified as EU2, all exhausting to one (1) stack, identified as S-1, and one (1) prime water cooler, identified as EU3, exhausting to one (1) stack, identified as S-2. **The regenerative thermal oxidizer exhausts to stack S-1 and the waste heat boiler will exhaust to stack S-14.**
  - (b) A Finish Coating Section (FCS), constructed in 1971, consisting of one (1) finish coater, identified as EU5, with a maximum capacity of 1142 lb VOC/hr (**3.75 gal VOC/min**), using one (1) **18.2 million British thermal units/hr recuperative thermal oxidizer** ~~direct flame finish oxidizer, rated at 30.0 million British thermal units per hour, identified as EU8/CE-2, as control with a maximum capacity of 3.75 gal VOC/min with heat exhausting to a waste heat boiler exhausting to stack S-14,~~ one (1) 37.6 mmBtu/hr finish curing oven, identified as EU6, all exhausting to one (1) stack, identified as S-3, and one (1) finish water cooler, identified as EU7, exhausting to one (1) stack, identified as S-4.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Coil Coating Operations [326 IAC 8-2-4] [326 IAC 8-1-2]

- (a) Pursuant to OP No. 3420-0005-0262, issued on October 31, 1990 and 326 IAC 8-2-4 (Coil Coating Operations), the VOC discharged into the atmosphere from the coil coating line shall not exceed of 0.31 kilograms per liter of coating (2.6 pounds per gallon) excluding water.
- (b) When operating either the ~~recuperative~~ **prime regenerative thermal oxidizer with waste heat boiler** identified as EU4/CE-1 ~~thermal~~, and finish **recuperative thermal oxidizer** ~~and/or the direct flame finish oxidizer, identified as EU8/CE-2~~ for VOC control as required by 326 IAC 8-1-2 (a)(2) to achieve the above limit in (a) for rule 326 IAC 8-2-4, a minimum overall control efficiency of 74.00% must be maintained. Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 74.00%, the daily weighted average VOC content of all the coatings shall not exceed 15.46 pounds of VOC per gallon of coating solids as applied.

D.1.2 no changes

D.1.3 Metal Coil Surface Coating NSPS [326 IAC 12-1-1] [40 CFR 60, Subpart TT]

This coil coating line is subject to 40 CFR 60, Subpart TT, which is incorporated by reference in 326 IAC 12-1-1. A copy of the rule is attached.

- (a) Either the **prime regenerative** thermal oxidizer, identified as EU4/CE-1 **and/or the finish recuperative thermal oxidizer** ~~recuperative thermal oxidizer, and/or the direct flame finish oxidizer, rated at 30.0 million British thermal units per hour,~~ identified as EU8/CE-2 shall be used continuously, i.e., at all times that the facility is operated, and operated at the most recently demonstrated overall efficiency.
- (b) The Permittee shall not cause to be discharged from the facility into the atmosphere more than:
  - (1) 0.28 kilogram VOC per liter (kg/l) of coating solids applied for each calendar month for each affected facility that does not use an emission control device, or
  - (2) 0.14 kilogram VOC per liter (kg/l) of coating solids applied for each calendar month for each affected facility that continuously uses an emission control device operated at the most recently demonstrated overall efficiency; or
  - (3) Ten (10%) percent of the VOC applied for each calendar month (ninety (90%) percent emission reduction) for each affected facility that continuously uses an emission control device operated at the most recently demonstrated overall efficiency; or
  - (4) A value between 0.14 (or a ninety (90%) percent emission reduction) and 0.28 kilogram VOC per liter (kg/l) of coating solids applied for each calendar month for each affected facility that intermittently uses an emission control device operated at the most recently demonstrated overall efficiency.

D.1.4 no changes

D.1.5 no changes

D.1.6 no changes

**Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.1.7 Testing Requirements [326 IAC 8-1-4] [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

**Compliance stack tests shall be performed within 90 days but no later than 270 days from the issuance of this First Administrative Amendment** ~~after During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform an overall VOC reduction efficiency test of~~ **on the coil coating line, consisting of the prime coater coating section,** identified as EU1 with its **regenerative thermal** oxidizer, identified as EU4/CE-1 and the **finish coater-coating section,** identified as EU5 with its **recuperative thermal oxidizer**, identified as EU8/CE-2 according to 326 IAC 3-6 (Source Sampling Procedures) using the methods specified in the rule or using other methods as approved by the Commissioner to demonstrate compliance with 326 IAC 8-2-4 (Surface coating emission limitations: coil coating operations). ~~This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid~~

~~compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.~~ **This compliance test shall satisfy the initial testing required in 40 CFR 60.8(a) and as required in Condition D.1.8. The compliance tests required thereafter shall be made following the schedule in Condition D.1.8.**

D.1.8 no changes

D.1.9 no changes

**D.1.10 Monitoring (326 IAC 8-2-4)**

- 
- (a) The **prime regenerative** ~~recuperative~~ thermal oxidizer, identified as EU4/CE-1 and the **finish recuperative thermal oxidizer** for VOC control ~~direct flame finish oxidizer~~, identified as EU8/CE-2 shall be in operation at all times when necessary to comply with the emission limitation specified in Condition D.1.1.
- (b) When operating, both the **prime regenerative** ~~recuperative~~ thermal oxidizer, identified as EU4/CE-1 and the ~~direct flame finish oxidizer~~, identified as EU8/CE-2 and the **finish recuperative thermal oxidizer, identified as EU8/CE-2** shall maintain a minimum operating temperature of 1,150EF for the **prime regenerative** ~~recuperative~~ thermal oxidizer and 1,150EF for the **finish recuperative thermal oxidizer** ~~direct flame finish oxidizer~~ or a minimum temperature, fan amperage and duct velocity as determined by the **recent** compliance tests required in Conditions D.1.7 and D.1.8. These minimum operating temperatures are required in order to maintain a minimum destruction efficiency of 86.02% and a minimum capture efficiency of 86.02%.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (d) The owner or operator shall install, calibrate, operate and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with 0.31 kilograms per liter of coating excluding water (2.6 pounds per gallon).
- (1) This device shall have an accuracy of  $\pm 2.5^{\circ}\text{C}$  or  $\pm 0.75$  percent of the temperature being measured expressed in degrees Celsius, which is greater.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.1.11 no changes

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.12 Record Keeping Requirements [326 IAC 8-1-2] [326 IAC 12-1-1] [40 CFR 60, Subpart TT]**

- 
- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) The volume weighted VOC content of the coatings used for each day that any coating with VOC content greater than 2.6 pounds per gallon is used, by:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [Dc * O * Q / [1 - W * Dc / Dw]]}{C}$$

Dc = density of coating, lb/gal      Dw = density of water, lb/gal  
O = weight percent organics, %      Q = quantity of coating, gal/unit  
W = percent volume of water, %      C = total of coatings used, gal/unit

- (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each month; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.1 and D.1.10(a), the Permittee shall record the dates and times, on an hourly basis, of all periods of startup and shutdown of the **prime regenerative recuperative** thermal oxidizer, identified as EU4/CE-1 and the ~~direct flame-finish~~ **recuperative thermal** oxidizer, identified as EU8/CE-2.
  - (c) To document compliance with Conditions D.1.1 and D.1.10(a), the Permittee shall record the dates and times, on an hourly basis, of all periods of changeout of coatings when the ~~recuperative thermal~~ **prime regenerative** thermal oxidizer, identified as EU4/CE-1 and the ~~direct flame-finish~~ **recuperative thermal** oxidizer, identified as EU8/CE-2 are not being used.
  - (d) To document compliance with Conditions D.1.1 and D.1.10(b), the Permittee shall also record all periods (during actual coating operations) in excess of three (3) hours during which the average temperature in EU4/CE-1 or EU8/CE-2 **prime regenerative** thermal oxidizer or **finish recuperative thermal** oxidizer ~~(the oxidizers used to control emissions)~~ remains more than 28EC (50EF) below the temperature at which compliance with 0.31 kilograms per liter of coating excluding water (2.6 pounds per gallon) was demonstrated during the most recent measurement of oxidizer efficiency required by D.1.7. The records shall identify each such occurrence and its duration.
  - (e) To document compliance with Condition D.1.3 and Condition D.1.8, the Permittee shall maintain at the source, for a period of at least two years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. The Permittee shall maintain at the source daily records of the ~~recuperative thermal~~ **regenerative** thermal oxidizer and the ~~direct flame-finish~~ **recuperative thermal** oxidizer combustion temperatures.

- (f) Record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in the ~~recuperative thermal~~ **regenerative** thermal oxidizer, identified as EU4/CE-1 and the **recuperative thermal** ~~direct flame finish~~ oxidizer, identified as EU8/CE-2 used to control emissions from an effected facility remains more than 28 degrees Celsius (50 degrees Fahrenheit) below the temperature at which compliance with 60.462(a)(2) or (3) was demonstrated during the most recent measurement of thermal oxidizer efficiency required by 40 CFR 60.8. The records required by 40 CFR 60.7 shall identify each such occurrence and its duration.
- (g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements [326 IAC 12, 40 CFR 60.465]

- (a) The Permittee shall include the following data in the initial compliance report required by 40 CFR 60.8:
  - (1) The overall VOC destruction rate; and
  - (2) The combustion temperature of the ~~recuperative thermal oxidizer and the direct flame finish oxidizer~~ **prime regenerative thermal oxidizer or finish recuperative thermal oxidizer**.used to attain compliance with Condition D.1.3.
- (b) Following the initial performance test, the Permittee shall identify, record, and submit a written report to IDEM, OAQ every calendar quarter of each instance in which the volume- weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under Condition D.1.3. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to IDEM, OAQ semiannually.
- (c) The Permittee shall also submit reports at the frequency specified in 40 CFR 60.7(c) when the **regenerative** ~~recuperative~~ thermal oxidizer and the **recuperative thermal** ~~direct flame finish~~ oxidizer temperatures drop as defined by Condition D.1.11(b). If no such periods occur, the Permittee shall state that in the report.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.  
If you have any questions on this matter, please contact Aida De Guzman at (800) 451-6027, press 0  
and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-48972.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

APD

cc: File - Porter County  
U.S. EPA, Region V  
Porter County Health Department  
Northwest Regional Office  
Air Compliance Section Inspector - Dave Sampias  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner



# **PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT**

**Precoat Metals, division Sequa Coatings Corporation  
U.S. Highway 12 and Route 249  
Portage, Indiana 46368**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T127-6025-00005	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: February 10, 1999
First Significant Permit Modification: SSM 127-11786-00005	Issuance Date: April 5, 2000
First Administrative Amendment: AA 127-14061-00005	Pages Affected: 4, 28, 29, 29a, 30, 31, 31a,
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: May 10, 2001

## TABLE OF CONTENTS

### A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

### B GENERAL CONDITIONS

- B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Permit Term [326 IAC 2-7-5(2)]
- B.4 Enforceability [326 IAC 2-7-7(a)]
- B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.6 Severability [326 IAC 2-7-5(5)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]
- B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.12 Preventive Maintenance Plan [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6-3]
- B.13 Emergency Provisions [326 IAC 2-7-16]
- B.14 Permit Shield [326 IAC 2-7-15]
- B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.18 Permit Renewal [326 IAC 2-7-4]
- B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
- B.20 Permit Revision Under Economic Incentives and Other Programs
- B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]
- B.22 Operational Flexibility [326 IAC 2-7-20]
- B.23 Construction Permit Requirement [326 IAC 2]
- B.24 Inspection and Entry [326 IAC 2-7-6(2)]
- B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
- B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

### C SOURCE OPERATION CONDITIONS

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Major Source
- C.2 Particulate Matter Emission Limitations for PWR Less Than 100 Pounds Per Hour
- C.3 Opacity [326 IAC 5-1]
- C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.6 Fugitive Dust Emissions [326 IAC 6-4]
- C.7 Operation of Equipment [326 IAC 2-7-6(6)]
- C.8 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18]

#### Testing Requirements [326 IAC 2-7-6(1)]

- C.9 Performance Testing [326 IAC 3-2.1]

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

- C.10 Compliance Schedule [326 IAC 2-7-6(3)]
- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.13 Monitoring Methods [326 IAC 3]

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-6] [326 IAC 2-7-19]
- C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)]
- C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

**Stratospheric Ozone Protection**

- C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1 FACILITY OPERATION CONDITIONS - One (1) Coil Coating Line (PCS and FCS)**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.1.1 Coil Coating Operations [326 IAC 8-2-12]
- D.1.2 General Provision Relating To NSPS [326 IAC 12-1-1] [40 CFR Part 60, Subpart A]
- D.1.3 Metal Coil Surface Coating NSPS [326 IAC 12-1-1] [40 CFR Part 60, Subpart TT]
- D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
- D.1.6 Nonapplicable Requirements [326 IAC 2-7-15 (a)(2)]

**Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.1.7 Testing Requirements [326 IAC 8-1-4] [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]
- D.1.8 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11] [326 IAC 12, 40 CFR Part 60, Subpart TT]
- D.1.9 Volatile Organic Compounds (VOC)
- D.1.10 Monitoring

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.1.11 Monitoring Requirements [326 IAC 12, 40 CFR 60.464]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.1.12 Record Keeping Requirements
- D.1.13 Reporting Requirements [326 IAC 12, 40 CFR 60.465]

**D.2 FACILITY OPERATION CONDITIONS - One (1) 25.1 mmBtu/hr Process Boiler**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.2.1 Nitrogen Oxides (NO<sub>x</sub>) [326 IAC 2-3]
- D.2.2 Particulate Matter (PM) [326 IAC 6-2-4]

**Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.2.3 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]
- D.2.4 Natural Gas Fired Boiler Certification

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.2.5 Record Keeping Requirements [40 CFR 60.40c, NSPS Subpart Dc]

D.2.6 Reporting Requirements

**D.3 FACILITY OPERATION CONDITIONS - One (1) Lime Slurry Mix Tank**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.3.1 Process Operations [326 IAC 6-3-2]

**Compliance Determination Requirements**

D.3.2 Testing Requirements [326 IAC 2-7-6(1)]

**Certification**

**Emergency/Deviation Occurrence Report**

**Natural Gas Fired Boiler Certification**

**Quarterly Compliance Report**

**Quarterly Report Form**

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

---

The Permittee owns and operates a metal coil coating operation.

Responsible Official: David A. Leligdon  
Source Address: U.S. Highway 12 and Route 249, Portage, Indiana 46368  
Mailing Address: 1310 Papin Street, Third Floor, St. Louis, Missouri 63103  
SIC Code: 3479  
County Location: Porter  
County Status: Nonattainment for Ozone, NOx and TSP  
Source Status: Part 70 Permit Program  
Major Source, under PSD and Emission Offset Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

---

This stationary metal coil coating source consists of the following emission units and pollution control devices:

- (1) One (1) coil coating line consisting of the following:
  - (a) A Prime Coating Section (PCS), constructed in 1971, consisting of one (1) prime coater, identified as EU1, with a maximum capacity of 883 lb VOC/hr (2.0 gal VOC/min), using one (1) 5.38 million British thermal units/hr regenerative thermal oxidizer with waste heat boiler, identified as EU4/CE-1, as control, one (1) 33.6 million British thermal units/hr prime curing oven, identified as EU2, exhausting to one (1) stack, identified as S-1, and one (1) prime water cooler, identified as EU3, exhausting to one (1) stack, identified as S-2. The regenerative thermal oxidizer exhausts to stack S-1 and the waste heat boiler will exhaust to stack S-14.
  - (b) A Finish Coating Section (FCS), constructed in 1971, consisting of one (1) finish coater, identified as EU5, with a maximum capacity of 1142 lb VOC/hr (3.75 gal VOC/min), using one (1) 18.2 million British thermal units/hr recuperative thermal oxidizer, identified as EU8/CE-2, one (1) 37.6 mmBtu/hr finish curing oven, identified as EU6, all exhausting to one (1) stack, identified as S-3, and one (1) finish water cooler, identified as EU7, exhausting to one (1) stack, identified as S-4.
- (2) One (1) natural gas-fired process boiler, identified as EU9, rated at 25.1 million British thermal units per hour, exhausting to Stack S-5.

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

---

This stationary metal coil coating source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (2) One (1) lime slurry mix tank, capable of mixing hydrated lime at a rate of 500 pounds per hour, using a baghouse to control the PM emissions.
- (3) One (1) chemical pretreatment section including two (2) alkaline cleaners, two (2) scrubber brushes, two (2) hot water rinses, two (2) chemical treatments and one (1) final chemical rinse. An exhaust hood conveys water vapor from the cleaners, scrubber brushes and hot water rinse tanks.
- (4) One (1) chemical coater for applying non-organic coatings and one (1) gas-fired infrared oven for drying the applied non-organic coatings, identified as EU11, exhausting to Stack S-13.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary metal coil coating source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

- (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

---

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) coil coating line consisting of the following:
- (a) A Prime Coating Section (PCS), constructed in 1971, consisting of one (1) prime coater, identified as EU1, with a maximum capacity of 883 lb VOC/hr (2.0 gal VOC/min), using one (1) 5.38 million British thermal units/hr regenerative thermal oxidizer with waste heat boiler, identified as EU4/CE-1, as control, one (1) 33.6 million British thermal units/hr prime curing oven, identified as EU2, exhausting to one (1) stack, identified as S-1, and one (1) prime water cooler, identified as EU3, exhausting to one (1) stack, identified as S-2. The regenerative thermal oxidizer exhausts to stack S-1 and the waste heat boiler will exhaust to stack S-14.
  - (b) A Finish Coating Section (FCS), constructed in 1971, consisting of one (1) finish coater, identified as EU5, with a maximum capacity of 1142 lb VOC/hr (3.75 gal VOC/min), using one (1) 18.2 million British thermal units/hr recuperative thermal oxidizer, identified as EU8/CE-2, one (1) 37.6 mmBtu/hr finish curing oven, identified as EU6, all exhausting to one (1) stack, identified as S-3, and one (1) finish water cooler, identified as EU7, exhausting to one (1) stack, identified as S-4.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Coil Coating Operations [326 IAC 8-2-4] [326 IAC 8-1-2]

- (a) Pursuant to OP No. 3420-0005-0262, issued on October 31, 1990 and 326 IAC 8-2-4 (Coil Coating Operations), the VOC discharged into the atmosphere from the coil coating line shall not exceed of 0.31 kilograms per liter of coating (2.6 pounds per gallon) excluding water.
- (b) When operating either the prime regenerative thermal oxidizer with waste heat boiler identified as EU4/CE-1 and finish recuperative thermal oxidizer identified as EU8/CE-2 for VOC control as required by 326 IAC 8-1-2 (a)(2) to achieve the above limit in (a) for rule 326 IAC 8-2-4, a minimum overall control efficiency of 74.00% must be maintained. Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 74.00%, the daily weighted average VOC content of all the coatings shall not exceed 15.46 pounds of VOC per gallon of coating solids as applied.

#### D.1.2 General Provisions Relating to NSPS [326 IAC 12-1-1] [40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart TT.

#### D.1.3 Metal Coil Surface Coating NSPS [326 IAC 12-1-1] [40 CFR 60, Subpart TT]

This coil coating line is subject to 40 CFR 60, Subpart TT, which is incorporated by reference in 326 IAC 12-1-1. A copy of the rule is attached.

- (a) Either the prime regenerative thermal oxidizer, identified as EU4/CE-1 and/or the finish recuperative thermal oxidizer identified as EU8/CE-2 shall be used continuously, i.e., at all times that the facility is operated, and operated at the most recently demonstrated overall efficiency.



- (b) The Permittee shall not cause to be discharged from the facility into the atmosphere more than:
- (1) 0.28 kilogram VOC per liter (kg/l) of coating solids applied for each calendar month for each affected facility that does not use an emission control device, or
  - (2) 0.14 kilogram VOC per liter (kg/l) of coating solids applied for each calendar month for each affected facility that continuously uses an emission control device operated at the most recently demonstrated overall efficiency; or
  - (3) Ten (10%) percent of the VOC applied for each calendar month (ninety (90%) percent emission reduction) for each affected facility that continuously uses an emission control device operated at the most recently demonstrated overall efficiency; or
  - (4) A value between 0.14 (or a ninety (90%) percent emission reduction) and 0.28 kilogram VOC per liter (kg/l) of coating solids applied for each calendar month for each affected facility that intermittently uses an emission control device operated at the most recently demonstrated overall efficiency.

**D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

The PM from the coil coating line shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

**D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the coil coating line and any control devices.

**D.1.6 Nonapplicable Requirements [326 IAC 2-7-15(a)(2)]**

The requirements that are not applicable to this coil coating line in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 have been determined to be as follows:

- (a) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR 63) applicable to this coil coating operation. As of permit issuance, there is no NESHAP applicable for coil coating operations.
- (b) This coil coating line is not subject to 326 IAC 8-6-2, since the source was constructed in 1971 which, was before the October 7, 1974 applicability date of the rule.
- (c) This coil coating line is not subject to 326 IAC 8-7. Even though the source has potential emissions greater than ten (10) tons per year, since the coil coating line is subject to 326 IAC 8-2-4, it is therefore, not subject to the requirements of 326 IAC 8-7.

**Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.7 Testing Requirements [326 IAC 8-1-4] [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]**

Compliance stack tests shall be performed within 90 days but no later than 270 days from the issuance of this First Administrative Amendment on the coil coating line, consisting of the prime coating section, identified as EU1 with its regenerative thermal oxidizer, identified as EU4/CE-1

and the finish coating section, identified as EU5 with its recuperative thermal oxidizer, identified as EU8/CE-2 according to 326 IAC 3-6 (Source Sampling Procedures) using the methods specified in the rule or using other methods as approved by the Commissioner to demonstrate compliance with 326 IAC 8-2-4 (Surface coating emission limitations: coil coating operations). This compliance test shall satisfy the initial testing required in 40 CFR 60.8(a) and as required in Condition D.1.8. The compliance tests required thereafter shall be made following the schedule in Condition D.1.8.

D.1.8 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11] [326 IAC 12, 40 CFR 60.463, NSPS Subpart TT]

---

To determine compliance with Condition D.1.3, the Permittee shall complete and/or maintain the following requirements:

- (a) The Permittee shall conduct an initial performance test as required under 40 CFR 60.8(a) and thereafter a performance test for each calendar month for each affected facility according to the procedures in this section.
- (b) 40 CFR 60.8(d) and (f) do not apply to the performance test.
- (c) The Permittee shall use the following procedures for determining monthly volume-weighted average emissions of VOC's in kg/l of coating solids applied.
  - (1) Determine the overall reduction efficiency (R) for the capture system and control devices, using procedures specified in 40 CFR 60.463(c)(2)(i).
  - (2) Calculate the volume-weighted average of the total mass of VOC's per unit volume of coating applied (G) during each calendar month for each affected facility using equations in 40 CFR 60.463(c)(1)(i)(A), (B), and (C).
  - (3) Calculate the volume-weight average VOC emissions to the atmosphere (N) for each calendar month by the following equation:  
$$N = G \cdot (1 - R)$$
  - (4) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/l of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test.

D.1.9 Volatile Organic Compounds (VOC)

---

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.10 Monitoring (326 IAC 8-2-4)

---

- (a) The prime regenerative thermal oxidizer, identified as EU4/CE-1 and the finish recuperative thermal oxidizer for VOC control identified as EU8/CE-2 shall be in operation at all times when necessary to comply with the emission limitation specified in Condition D.1.1.
- (b) When operating, both the prime regenerative thermal oxidizer, identified as EU4/CE-1 and the finish recuperative thermal oxidizer, identified as EU8/CE-2 shall maintain a minimum operating temperature of 1,150°F for the prime regenerative oxidizer and 1,150°F for the finish recuperative thermal oxidizer or a minimum temperature, fan amperage and duct velocity as determined by the compliance tests required in Conditions D.1.7 and D.1.8. These minimum operating temperatures are required in order to maintain a minimum destruction efficiency of 86.02% and a minimum capture efficiency of 86.02%.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

- (d) The owner or operator shall install, calibrate, operate and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with 0.31 kilograms per liter of coating excluding water (2.6 pounds per gallon).
- (1) This device shall have an accuracy of  $\pm 2.5^\circ\text{C}$  or  $\pm 0.75$  percent of the temperature being measured expressed in degrees Celsius, which is greater.

#### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

##### **D.1.11 Monitoring Requirements [326 IAC 12, 40 CFR 60.464]**

The Permittee shall:

Install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with Condition D.1.3. This device shall have an accuracy of  $\pm 2.5$  degrees Celsius or  $\pm 0.75$  percent of the temperature being measured expressed in degrees Celsius, whichever is greater.

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **D.1.12 Record Keeping Requirements [326 IAC 8-1-2] [326 IAC 12-1-1] [40 CFR 60, Subpart TT]**

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) The volume weighted VOC content of the coatings used for each day that any coating with VOC content greater than 2.6 pounds per gallon is used, by:
- $$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [D_c * O * Q / (1 - W * D_c / D_w)]}{3C}$$
- $D_c$  = density of coating, lb/gal       $D_w$  = density of water, lb/gal  
 $O$  = weight percent organics, %       $Q$  = quantity of coating, gal/unit  
 $W$  = percent volume of water, %       $C$  = total of coatings used, gal/unit
- (4) The cleanup solvent usage for each month;
- (5) The total VOC usage for each month; and
- (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.1 and D.1.10(a), the Permittee shall record the dates and times, on an hourly basis, of all periods of startup and shutdown of the prime regenerative thermal oxidizer, identified as EU4/CE-1 and the finish recuperative thermal oxidizer, identified as EU8/CE-2.

- (c) To document compliance with Conditions D.1.1 and D.1.10(a), the Permittee shall record the dates and times, on an hourly basis, of all periods of changeout of coatings when the prime regenerative thermal oxidizer, identified as EU4/CE-1 and the finish recuperative thermal oxidizer, identified as EU8/CE-2 are not being used.
- (d) To document compliance with Conditions D.1.1 and D.1.10(b), the Permittee shall also record all periods (during actual coating operations) in excess of three (3) hours during which the average temperature in EU4/CE-1 or EU8/CE-2 prime regenerative thermal oxidizer or finish recuperative thermal oxidizer remains more than 28EC (50EF) below the temperature at which compliance with 0.31 kilograms per liter of coating excluding water (2.6 pounds per gallon) was demonstrated during the most recent measurement of oxidizer efficiency required by D.1.7. The records shall identify each such occurrence and its duration.
- (e) To document compliance with Condition D.1.3 and Condition D.1.8, the Permittee shall maintain at the source, for a period of at least two years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. The Permittee shall maintain at the source daily records of the regenerative thermal oxidizer and recuperative thermal oxidizer combustion temperatures.
- (f) Record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in the regenerative thermal oxidizer, identified as EU4/CE-1 and the recuperative thermal oxidizer, identified as EU8/CE-2 used to control emissions from an effected facility remains more than 28 degrees Celsius (50 degrees Fahrenheit) below the temperature at which compliance with 60.462(a)(2) or (3) was demonstrated during the most recent measurement of thermal oxidizer efficiency required by 40 CFR 60.8. The records required by 40 CFR 60.7 shall identify each such occurrence and its duration
- (g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements [326 IAC 12, 40 CFR 60.465]

- (a) The Permittee shall include the following data in the initial compliance report required by 40 CFR 60.8:
  - (1) The overall VOC destruction rate; and
  - (2) The combustion temperature of prime regenerative thermal oxidizer or finish recuperative thermal oxidizer.
- (b) Following the initial performance test, the Permittee shall identify, record, and submit a written report to IDEM, OAM every calendar quarter of each instance in which the volume- weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under Condition D.1.3. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to IDEM, OAM semiannually.
- (c) The Permittee shall also submit reports at the frequency specified in 40 CFR 60.7(c) when the regenerative thermal oxidizer and the recuperative thermal oxidizer temperatures drop as defined by Condition D.1.11(b). If no such periods occur, the Permittee shall state that in the report.

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

One (1) natural gas-fired process boiler, identified as EU9, rated at 25.1 million British thermal units per hour, exhausting to Stack S-5.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Nitrogen Oxides (NO<sub>x</sub>) [326 IAC 2-3]

The total input of natural gas to the process boiler, identified as EU9, shall be limited to less than 205.5 million cubic feet per twelve (12) consecutive month period. This fuel limit combined with the unlimited potential to emit from the direct flame finish oxidizer and infrared oven (deemed an insignificant activity with no rules) is equivalent to less than twenty-five (25.0) tons per twelve (12) consecutive month period of NO<sub>x</sub>.

#### D.2.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(c)), the PM emissions from the 25.1 million British thermal units per hour process boiler shall be limited to 0.376 pounds per million British thermal units heat input as calculated by the following equation:

$$Pt = \frac{0.87}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million British thermal units.

Q = Total source maximum operating capacity rating in million British thermal units heat input. The maximum operating capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used.

#### D.2.3 Non-applicable Requirements [326 IAC 2-7-15(a)(2)]

The requirement that is not applicable to this process boiler in accordance with Section B - Permit Shield, of this permit and 326 IAC 2-7-15 has been determined to be as follows:

There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR 63) applicable to the natural gas-fired process boiler, known as EU9. As of permit issuance, there is no NESHAP applicable for natural gas combustion facilities.

### Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.2.4 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.2 shall be determined by a performance test conducted in accordance with Section C -

Performance Testing.

**D.2.5 Natural Gas Fired Boiler Certification**

---

An annual certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than April 15 of each year.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.2.6 Record Keeping Requirements [40CFR 60.40c, NSPS Subpart Dc]**

---

- (a) To document compliance with Condition D.2.1 and NSPS Subpart Dc, the Permittee shall maintain records in accordance with (1) through (3) below.
- (1) Calendar dates covered in the compliance determination period;
  - (2) Type of fuel combusted in the process boiler, and
  - (3) Actual natural gas consumption in the process boiler.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.2.7 Reporting Requirements**

---

A quarterly summary to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. These reports shall include the amount of natural gas consumption each month. All records and reports shall use calendar months.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Precoat Metals division Sequa Coatings Corporation  
Source Address: U.S. Highway 12 and Route 249, Portage, Indiana 46368  
Mailing Address: 1310 Papin Street, Third Floor, St. Louis, Missouri 63103  
Part 70 Permit No.: T127-6025-00005

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

<b>Compliance Monitoring Requirement</b> (e.g. Permit Condition D.1.3)	<b>Number of Deviations</b>	<b>Date of each Deviation</b>

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**



**OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Precoat Metals division Sequa Coatings Corporation  
Source Address: U.S. 12 and Indiana 249, Portage, Indiana 46368  
Mailing Address: U.S. 12 and Indiana 249, Portage, Indiana 46368  
Modification No.: SSM 127-11786-00005  
Facility: Process Boiler (EU9)  
Parameter: Natural gas consumption  
Limit: 205.5 million cubic feet per twelve (12) consecutive month period  
Equivalent to less than twenty-five (25.0) tons of NO<sub>x</sub> per twelve (12) consecutive month period, including the direct flame finish oxidizer and the infrared oven at full potential-to-emit.

YEAR: \_\_\_\_\_

Month	Natural Gas Usage (MMCF)	Natural Gas Usage (MMCF)	Natural Gas Usage (MMCF)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_